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★ MAR 08 2024 ★

BROOKLYN OFFICE

RTP:FTB
F. #2020R00214

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

XINYUE "DANIEL" LOU,

Defendant.
----- X

INDICTMENT

CR 24 0099
Cr. No.

(T. 18, U.S.C., §§ 371, 2 and 3551 et seq.;
T. 52, U.S.C., §§ 30122 and
30109(d)(1)(A)(i))

DONNELLY, J.

SCANLON, M.J.

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Defraud the United States)

1. On or about and between March 1, 2019 and March 18, 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant XINYUE "DANIEL" LOU, together with others, did knowingly and willfully conspire to: (a) defraud the United States by impairing, obstructing and defeating the lawful functions of a department or agency of the United States, to wit: the Federal Election Commission's function to administer federal laws concerning the source and amount restrictions in federal elections, including the prohibitions applicable to straw donors; and (b) make contributions to a joint fundraising committee, an entity the identity of which is known to the Grand Jury (the "Committee"), in the names of other persons, aggregating to \$25,000 or more in a calendar year, contrary to Title 52, United States Code, Sections 30122 and 30109(d)(1)(A)(i).

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant XINYUE “DANIEL” LOU, together with others, committed and caused to be committed, among others, the following:

OVERT ACTS

(a) On or about March 8, 2019, LOU sent an electronic message to an individual whose identity is known to the Grand Jury (“Individual No. 1”).

(b) On or about March 9, 2019, LOU provided approximately \$5,600 in cash to Individual No. 1 as reimbursement for a contribution to the Committee, made ostensibly in the name of Individual No. 1.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO

(Contributions in the Names of Others)

3. In or about March 2019, within the Eastern District of New York and elsewhere, the defendant XINYUE “DANIEL” LOU, together with others, did knowingly and

willfully make contributions to the Committee in the names of other persons, aggregating to \$25,000 or more in a calendar year.

(Title 52, United States Code, Sections 30122 and 30109(d)(1)(A)(i); Title 18, United States Code, Sections 2 and 3551 et seq.)

A TRUE BILL

A handwritten signature in black ink, appearing to be "J. L. ...", is written over a horizontal line. Below the line, the word "FOREPERSON" is printed in all caps.

FOREPERSON

By Carolyn Pokorny, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F #: 2020R00214
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

XINYUE "DANIEL" LOU,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 371, 2 and 3551, et seq.; T. 52, U.S.C., §§ 30122 and
30109(d)(1)(A)(i))

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

F. Turner Buford, Assistant U.S. Attorney (718) 254-6483